

**ENTERED**

August 09, 2022

Nathan Ochsner, Clerk

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

TRACEY CLINE,  
PLAINTIFF,

vs.

SHELL PIPELINE COMPANY LP AND  
SHELL MIDSTREAM PARTNERS, L.P.  
DEFENDANTS.

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Civil Action No. 4:21-cv-02482

JURY TRIAL DEMANDED

**JOINT MOTION TO MODIFY SCHEDULING ORDER**

Plaintiff Tracey Cline and Defendants Shell Pipeline Company LP and Shell Midstream Partners, L.P. jointly file this Motion to Modify Scheduling Order, respectfully stating as follows:

1. This is an employment discrimination lawsuit. Plaintiff filed this lawsuit on August 2, 2021.
2. The current scheduling order sets the following upcoming deadlines:
  - Discovery: August 5, 2022
  - Dispositive Motions: September 6, 2022
  - Deadline for Joint Pretrial Order: December 9, 2022
  - Docket Call: January 6, 2023
3. The Parties have engaged in some written discovery but have been unable to complete discovery, including the depositions of Plaintiff and Defendants' witnesses, due to various scheduling conflicts and the ongoing production of records related to the case. This additional discovery, including witness depositions, is critical to the Parties' ability to assess the claims and defenses at issue, exhaust pretrial matters, including dispositive motions that may narrow the issues for trial, and evaluate the potential for a resolution.
4. In light of the additional discovery that is needed, the Parties respectfully request that the Court grant this Joint Motion and modify the scheduling order as follows:

Event	Prior Deadline	New Deadline
Plaintiff's Expert Deadline	April 30, 2022	September 30, 2022
Defendant's Expert Deadline	May 30, 2022	October 31, 2022
Discovery	August 5, 2022	January 13, 2023
Motions Deadline	September 6, 2022	February 10, 2023
Joint Pretrial Order due from Defendants	December 9, 2022	April 14, 2023
Joint Pretrial Order must be filed by Plaintiff	December 23, 2022	April 28, 2023
Docket Call	January 6, 2023	May 5, 2023
Trial	January 9, 2023	May 8, 2023

5. A proposed scheduling order reflecting the above deadlines is attached.

6. This is the first request for a continuance in this case. This continuance is not sought for purposes of delay but so that justice may be done.

Respectfully submitted,

DOW GOLUB REMELS & GILBREATH, PLLC

*s/ Andrew S. Golub*

Andrew S. Golub

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P.C.

/s/ Marlene C. Williams (by permission)

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ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I certify that on August 5, 2022, I served a copy of the foregoing instrument on all counsel of record using the Court's ECF system.

s/ Andrew S. Golub

Andrew S. Golub

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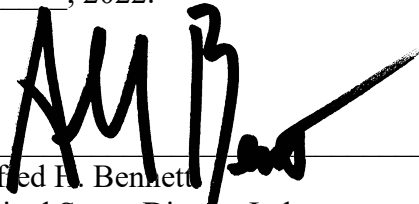
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**ORDER GRANTING JOINT MOTION TO MODIFY SCHEDULING ORDER**

Before the Court is the Parties' Joint Motion to Modify Scheduling Order. After considering said Motion, the Court is of the opinion that the Motion should be GRANTED. It is therefore ORDERED that the deadlines are reset as follows and reflected in the Amended Scheduling Order signed by the Court:

Event	New Deadline
Plaintiff's Expert Deadline	September 30, 2022
Defendant's Expert Deadline	October 31, 2022
Discovery	January 13, 2023
Motions Deadline	February 10, 2023
Joint Pretrial Order due from Defendants	April 14, 2023
Joint Pretrial Order must be filed by Plaintiff	April 28, 2023
Docket Call	May 5, 2023 at 1:30 p.m.
Trial	May 8, 2023 at 9:00 a.m.

Signed on this 9th day of August, 2022.


Alfred H. Bennett  
United States District Judge

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**AMENDED SCHEDULING ORDER**

September 30, 2022	Plaintiff, or party with the burden of proof, will designate expert witnesses in writing, listing the qualifications of each expert, the opinions the expert will present, and the bases for the opinions as required under Federal Rule of Civil Procedure 26(A)(2).
October 31, 2022	Defendant, or party without the burden of proof, will designate expert witnesses in writing, listing the qualifications of each expert, the opinions the expert will present, and the bases for the opinions as required under Federal Rule of Civil Procedure 26(A)(2).
January 13, 2023	DISCOVERY Counsel may, by agreement, continue discovery beyond the deadline. No continuance will be granted because of information acquired in post-deadline discovery.
February 10, 2023	MOTIONS DEADLINE Including any motion challenging an expert witness (only motions in limine on issues other than experts may be filed after this date). The motion deadline may <u>not</u> be changed by agreement.

April 14, 2023	JOINT PRETRIAL ORDER THE DEFENDANT shall supply the Plaintiff with a final version of its pretrial order by this date. (Where available, Defendant should supply Plaintiff with an electronic copy.)
April 28, 2023	JOINT PRETRIAL ORDER THE PLAINTIFF is responsible for filing the pretrial order on this date. All Motions in Limine must also be filed by this date.
May 5, 2023	DOCKET CALL is set at 1:30 p.m. in Courtroom C
May 8, 2023	TRIAL is set to begin at 9 a.m. in Courtroom 8C. Case is subject to being called to trial on short notice during the two week period beginning on this date.

SIGNED on \_\_\_\_\_, 2022.

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Alfred H. Bennett  
United States District Judge